

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF JAYLYNN DEAN**

This Document Relates to:

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17 Floor

*Jaylynn Dean v. Uber Techs., Inc.*,  
N.D. Cal. No. 23-cv-06708  
D. Ariz. No. 25-cv-4276

**DECLARATION OF JAYLYNN DEAN**  
Case No. 3:23-md-03084-CRB

1 I, Jaylynn Dean, declare:

2 1. I am the Plaintiff in the above-captioned action. If called upon to testify, I could and  
3 would testify competently to the truth of the matters stated below.

4 2. As I testified during my deposition, I downloaded the Uber app after seeing  
5 advertisements representing Uber rides as a safe option, including for a person who had been  
6 drinking.

7 3. When I downloaded the Uber app, I understood that the app would allow me to  
8 order rides from Uber.

9 4. I understood that the app would allow me to pay Uber, not drivers, for rides.

10 5. On November 15, 2023, I thought I was taking an Uber ride and that Uber was  
11 responsible for keeping me safe.

12 6. I do not remember ever reading Uber's Terms of Use.

13 7. I do not and did not ever flag down random people on the street for a ride, and  
14 would only engage a ride from a rideshare service provider like Uber because I believed it to be  
15 responsible for its drivers.

16 I declare under penalty of perjury that the foregoing is true and correct.

17 Executed this 9th day of December, 2025 in Nashville, Tennessee.

18  
19 \_\_\_\_\_  
20 Jaylynn Dean